

# EXHIBIT A

## Angus Ni

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**From:** Angus Ni  
**Sent:** Tuesday, April 8, 2025 6:59 PM  
**To:** 'Bill Frimel'  
**Cc:** Jing He  
**Subject:** RE: My vm re Tyron and ex parte application

Bill,

Pls confirm you will not rush to OFAC before the status conference. I also want to let you know that we are going to make a submission requesting such an order from the judge shortly.

Please let me know if you'll confirm the below 3 items before the conference.

We reserve all rights.

-AFN

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**From:** Angus Ni  
**Sent:** Monday, April 7, 2025 9:23 AM  
**To:** 'Bill Frimel' <Bill@sfw-law.com>  
**Cc:** Jing He <Jing@moni.law>  
**Subject:** RE: My vm re Tyron and ex parte application

Dear Bill,

Your ex parte application says absolutely nothing about what basis on which the "BIS" and "FBI" told you to get an OFAC opinion. There is no warrant, no order, no law, nothing. Just what appears to be a "suggestion" that you interpreted to be an official directive.

As you might know, there are many people in the FBI who have no understanding about how the sanctions regime works. So a mere phone call with an "agent" during which such agent told you that you might want to get an OFAC license is not a basis to run to OFAC to delay this matter. Indeed, you yourselves did an OFAC check pre-settlement, and found nothing. What is more, you already made a payment through an OFAC-regulated major bank, which payment was not flagged for any OFAC issues. On this basis, our initial analysis is that you have no basis to go to OFAC, and even if you did, OFAC has no jurisdiction.

Given this, any attempt by you to rush to OFAC will be viewed by our side as a bad faith attempt to find an excuse not to pay or to delay. Please, therefore, immediately:

- 1. Confirm that you will not rush to OFAC with any bad faith filing;**
- 2. Confirm that you have the money that was supposed to be paid as of today ready to be paid and placed into your attorney trust account, pending resolution of this issue;**
- 3. Identify the FBI/BIS agent or agents you spoke to so we may conduct our diligence into this matter.**

If you do not confirm the above within the next 24 hours, you should expect a cross motion to enforce the stipulated judgment immediately, for judgment-related discovery (including the identities of these agents so we can request their appearance in court), and any other available remedies we identify. Obviously, if you do rush to the OFAC and that results in delay, we will be seeking all pre and post-judgment interest.

Best,

-AFN

-----Original Message-----

From: Bill Frimel <[Bill@sfw-law.com](mailto:Bill@sfw-law.com)>  
Sent: Friday, April 4, 2025 4:55 PM  
To: Angus Ni <[angus@moni.law](mailto:angus@moni.law)>  
Subject: RE: My vm re Tyron and ex parte application

Just did. I'm available on my cell. 650-996-0414.

-----Original Message-----

From: Angus Ni <[angus@moni.law](mailto:angus@moni.law)>  
Sent: Friday, April 4, 2025 4:46 PM  
To: Bill Frimel <[Bill@sfw-law.com](mailto:Bill@sfw-law.com)>  
Subject: Re: My vm re Tyron and ex parte application

Hey ring me back?

-AFN

773 543 3223

> On Apr 4, 2025, at 7:19 PM, Bill Frimel <[Bill@sfw-law.com](mailto:Bill@sfw-law.com)> wrote:

>

> Hi Angus,

> Please call me at your convenience. I want to discuss a telephone call that my client had with the FBI and BIS regarding your client. Absent a stipulation, we will need to file an ex parte application. My cell phone is 650-996-0414.

> Thank you.

> Bill

> Sent from my iPhone